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**Federal Communications Commission
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November 21, 2003

DAVID A. O'CONNOR
202-828-1889

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VIA HAND DELIVERY

Marlene H. Dortch, Esq., Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554
Attention: Audio Division, Media Bureau

Re: Amendment of Section 73.202(b), Table of Allotments,
FM Broadcast Stations, Channel 298A, Sutter Creek, California
Petition for Rulemaking

Dear Ms. Dortch:

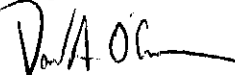
Transmitted herewith, on behalf of Calvary Chapel of Amador County, are an original and four (4) copies of its Petition for Rulemaking to amend the FM Table of Allotments in order to designate Channel 298A allotted to Sutter Creek, California as a reserved channel for noncommercial educational FM service.

An extra copy of the filing is enclosed. Please date-stamp the extra copy and return it to the courier.

Should you have any questions, please contact the undersigned.

Respectfully submitted,

HOLLAND & KNIGHT LLP


David A. O'Connor
Counsel for Calvary Chapel of Amador County

Enclosure
cc: Rolanda F. Smith, Audio Division

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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NOV 21 2003

Federal Communications Commission
Office of Secretary

In the Matter of)
Amendment of Section 73.202(b)) RM _____
Table of Allotments,)
FM Broadcast Stations.) MB Docket No. _____
(Channel 298A, Sutter Creek, California))

To: Chief, Audio Division, Media Bureau

PETITION FOR RULEMAKING

Calvary Chapel of Amador County ("Calvary Amador"), by its attorneys and pursuant to Sections 1.401 and 73.202(a) of the Commission's rules, 47 C.F.R. §§ 1.401, 73.202(a), hereby respectfully petitions the Commission for modification of the Commission's Table of Allotments for FM Broadcast Stations, 47 C.F.R. § 73.202(b).¹ Specifically, Calvary Amador requests that non-reserved FM channel 298A allotted to Sutter Creek, California be reserved only for noncommercial educational ("NCE") broadcasting, and that the Commission modify the FM Table of Allotments as follows:

¹ In a Public Notice released on September 30, 2003, the Commission announced that it would accept "reservation showings" until November 21, 2003 for various vacant FM allotments. *See Media Bureau Opens Window to Permit Noncommercial Educational Reservation Showings for Certain Vacant Allotments*, Public Notice, DA 03-2990 (rel. Sept. 30, 2003). In Attachment A to the Public Notice, Channel 298A, allotted to Sutter Creek, California is listed as a vacant FM channel for which the Commission would accept a reservation showing. *See id.* at A-2 (No. 51). The reservation showing contained herein is made for Channel 298A allotted to Sutter Creek, California, and is timely filed under Commission rules.

Existing Section 73.202(b)

...

California

...

Sutter Creek.....298A

...

Proposed New Section 73.202(b)

...

California

...

Sutter Creek.....*298A

...

A Technical Statement, attached as Exhibit 1 hereto, demonstrates that Calvary Amador's proposal fully complies with the Commission's technical rules. Specifically, the Technical Statement demonstrates that Calvary Amador's proposal is consistent with paragraphs 34-40 of the Commission's *NCE Second Report and Order* and satisfies the two criteria set forth therein.²

NEW FIRST OR SECOND SERVICE

The proponent of an NCE reservation showing must demonstrate that maximum class facilities at the proposed allotment site would provide a first or second NCE service to at least ten percent of the population within the proposed station's service area, and that such population is at least 2000 persons.³ The Technical Statement demonstrates that more than 62,000 persons would receive a new first or second NCE FM service under Calvary Amador's proposal. That

² *Reexamination of the Comparative Standards for Noncommercial Educational Applicants*, MM Docket No. 95-31, *Second Report and Order*, FCC 03-44, 18 FCC Rcd 6691 (rel. Apr. 10, 2003) ("*Second Report and Order*").

³ *Id.* para. 34.

represents *more than 59 percent* of the total population within the proposed station's service area.⁴

The percentage of persons that would receive a new first or second NCE FM service under Calvary Amador's proposal is considerably more than the minimum of 10% of the total population which the Commission requires.⁵ Furthermore, the number of persons that would be served by the proposed station is well over the required minimum of 2000 persons.⁶ Accordingly, the NCE service standards set forth in the *Second Report and Order* are satisfied.

TECHNICAL PRECLUSION

The Commission also requires a reasonable demonstration that NCE service is technically impermissible from a currently reserved NCE channel.⁷ The Technical Statement demonstrates, "to a reasonable degree of certitude,"⁸ the technical preclusion of a compliant, NCE reserved band Class A FM facility, at minimum height above average terrain ("HAAT") and with minimum effective radiated power ("ERP"), in the proposed station's service area. Using the "reliable and efficient proxy of technical preclusion" endorsed by the Commission in the *Second Report and Order*,⁹ the Technical Statement establishes the presumption

⁴ As set forth in the Technical Statement, the total population in the proposed station's service area is 104,394. See Exhibit 1 at 2.

⁵ See *Second Report and Order*, para. 34.

⁶ See *id.*

⁷ *Id.* para. 35.

⁸ *Id.* para. 33.

⁹ See *id.* para. 35.

that such an NCE reserved band facility for Sutter Creek, California would be technically precluded.

PUBLIC INTEREST SHOWING

A grant of this Petition would serve the public interest because Calvary Amador's proposal would substantially further the fair, efficient and equitable distribution of service by helping to bring a new NCE FM station to the Sutter Creek, California community. Such a fair, efficient and equitable distribution of service is specifically mandated by Section 307(b) of the Communications Act of 1934, as amended.¹⁰

DECLARATION

Also attached is a Declaration from George Stathos, President of Calvary Amador, affirming that Calvary Amador will apply for the Channel 298A Sutter Creek allotment if changed as proposed.

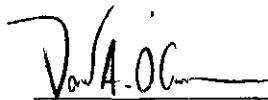
¹⁰ 47 U.S.C. § 307(b).

CONCLUSION

Calvary Amador has satisfied all criteria necessary to a reservation showing. Therefore, the Commission should grant this Petition and issue an appropriate Notice of Proposed Rule Making to reserve Channel 298A allotted to Sutter Creek for noncommercial educational broadcasting.

Respectfully submitted,

CALVARY CHAPEL OF AMADOR COUNTY



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Its Attorney

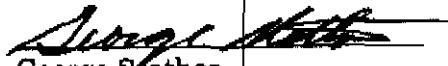
November 21, 2003

DECLARATION

I, George Stathos, declare as follows:

1. I am President of Calvary Chapel of Amador County ("Calvary Amador"), the petitioner in this proceeding.
2. Calvary Amador intends to apply for a construction permit for Channel 298A upon adoption of the proposed rule making, as proposed herein, amending Section 73.202, Table of Allotments, FM Broadcast Stations (Sutter Creek, California).
3. If awarded the construction permit for Channel 298A, Calvary Amador will construct and operate such facilities pursuant to its terms and conditions.

I hereby declare, under penalty of perjury, that the statements made in this declaration are true and accurate to the best of my knowledge, information and belief.


George Stathos

November 20, 2003

EXHIBIT 1

TECHNICAL STATEMENT

1382144_v1

ENGINEERING TECHNICAL STATEMENT PREPARED BY WILLIAM T. GODFREY OF THE FIRM KESSLER AND GEHMAN ASSOCIATES, INC. TELECOMMUNICATIONS CONSULTING ENGINEERS IN SUPPORT OF A PETITION FOR RULEMAKING TO RESERVE THE VACANT COMMERCIAL FM CHANNEL 298A SUTTER CREEK, CA ¹ ALLOTMENT BY DEMONSTRATING THAT THE APPLICANT IS TECHNICALLY PRECLUDED FROM USING A RESERVED CHANNEL PURSUANT TO THE SECOND REPORT AND ORDER RELEASED ON APRIL 10, 2003 IN THE MATTER OF REEXAMINATION OF COMPARATIVE STANDARD FOR NONCOMMERCIAL EDUCATIONAL APPLICANTS., FCC 03-44.

The firm Kessler and Gehman Associates, Inc. has been retained by Calvary Chapel of Amador County to prepare engineering studies and the engineering portion of a Petition for Rulemaking ("PFRM") to reserve the vacant commercial FM Channel 298A Sutter Creek, CA allotment.

Discussion

This PFRM for reservation of the commercial FM Channel 298A Sutter Creek, CA allocation satisfies the first or second noncommercial educational ("NCE") service criteria and the technical preclusion criteria.

I. First or Second Service Showing

All noncommercial and commercial FM allocations, licenses, construction permits which have a transmitter site within a minimum safe search radius² from the allocated site are listed in Exhibit 1 along with any affected TV Channel 6 stations. The first or second service criteria do not require FM applications or allocations to be considered. Accordingly, Exhibit 1 depicts the FM applications and allocations with a strikethrough so that they would not be considered. Obviously, the commercial sites were not applicable and were not considered in the study.

¹ See Public Notice, No. 51 (Sutter Creek, CA Channel 273A), Released Sept. 30, 2003)

² The following distances were added together to formulate a "safe search radius":

- 1) Maximum distance to 1 mV/m contour for a maximum allowable facility in the applicable zone pursuant to section 73.211;
- 2) Maximum distance to the 1 mV/m contour for Class of the allocation pursuant to section 73.211;
- 3) An additional 30 km buffer was added for a "safety factor."

Exhibit 2 is a map depicting the transmitter sites and the 1 mV/m service contours of all the applicable NCE-FM stations located within the minimum safe search radius. The areas within the maximum class facility's 1 mV/m service contour at the proposed allotment site that would be considered a first or second service were depicted in Exhibit 2. It can be seen that there were areas within the service contour ranging from first service to fourth service. The population study calculated the total population within the maximum class facility's 1 mV/m service contour for Sutter Creek, CA to be 104,394 persons. The shaded area depicted in Exhibit 2 overlaps the areas within the Sutter Creek, CA 1 mV/m contour where there is at least a third service or more. The total population within the shaded area is predicted to be 42,217 persons. Therefore, the total population within the proposed Sutter Creek, CA maximum facility contour that would receive a first or second NCE-FM service is predicted to be 62,177 persons which is greater than 10% of the population within the proposed station's service area and is greater than the minimum required population of 2,000 persons. All population counts were calculated using U.S. Census 2000 data.

It has been shown that the proposed Sutter Creek, CA station would meet the first or second service requirements; however a reservation request must also include a technical preclusion showing in order to establish that no rule-compliant facility could be authorized on any reserved band channel. Upon satisfying these criteria, it would be considered presumptively established that the allotment should be reserved based on the fact that a non-reserved band FM station licensed to the proposed community with the proposed class facilities would be technically precluded from providing service on a reserved band channel.

II. Technical Preclusion of New NCE Service

Pursuant to paragraph 35³, of the Second Report and Order released on April 10, 2003, technical preclusion showings have been prepared to provide a reliable and efficient proxy of technical preclusion.

³ The Second Report and Order states: "[A] showing will be based on a circle, centered in the proposed community of license and drawn with a radius one kilometer less than the distance to the predicted 60 dBu strength signal of a maximum same-class facility. The reservation showing must establish that no rule-compliant facility can be authorized at maximum antenna height above average terrain ("HAAT") and with maximum effective radiated power ("ERP") on any reserved band channel at four equally-spaced locations on the circle, beginning with 0 (zero) degrees. In addition, the reservation showing must establish that no same-class rule-compliant facility can be authorized at minimum antenna HAAT and with minimum ERP on any reserved band channel at the city center coordinates for the community of license."

Exhibit 3 depicts a circle centered at the allotted Sutter Creek, CA transmitter site and drawn with a radius of 27 km, which is one kilometer less than the distance to the predicted 60 dBu signal strength of a maximum Class A facility. Exhibit 3 also depicts the four equally-spaced locations on the circle, beginning with zero degrees. The coordinates were determined and documented at the four equally-spaced locations and interference studies were performed at each location using the authorized maximum antenna HAAT and maximum ERP for a Class A facility. The center of the circle is plotted at the allotted transmitter site and interference studies were performed at that transmitter site using the authorized minimum antenna HAAT and minimum ERP for a Class A facility.

Exhibit 4 is the result of a preclusion study⁴ conducted at the allotted transmitter site using minimized facilities for its station class⁵. The exhibit demonstrates preclusion for all NCE-FM channels. It can be seen that the proposed facility at this site would cause interference to NCE-FM stations on all 20 NCE-FM channels.

Exhibit 5 is the result of a preclusion study conducted at a site located 27 km at 0 (zero) degrees from the allotted transmitter site using the authorized maximum antenna HAAT of 100 meters and the maximum ERP of 6 kW for a Class A facility. It can be seen that the proposed facility at this site would cause interference to NCE-FM stations on all 20 NCE-FM channels.

Exhibit 6 is the result of a preclusion study conducted at a site located 27 km at 90 degrees from the allotted transmitter site using the authorized maximum antenna HAAT of 100 meters and the maximum ERP of 6 kW for a Class A facility. It can be seen that the proposed facility at this site would cause interference to NCE-FM stations on all 20 NCE-FM channels.

Exhibit 7 is the result of a preclusion study conducted at a site located 27 km at 180 degrees from the allotted transmitter site using the authorized maximum antenna HAAT of 100 meters and the maximum ERP of 6 kW for a Class A facility. It can be seen that the proposed facility at this site would cause interference to NCE-FM stations on all 20 NCE-FM channels.

Exhibit 8 is the result of a preclusion study conducted at a site located 27 km at 270 degrees from the allotted transmitter site using the authorized maximum antenna HAAT of 100 meters and the maximum

⁴ pursuant to section 73.509 and 73.507

⁵ pursuant to section 73.211(a)

ERP of 6 kW for a Class A facility. It can be seen that the proposed facility at this site would cause interference to NCE-FM stations on all 20 NCE-FM channels.

Conclusion

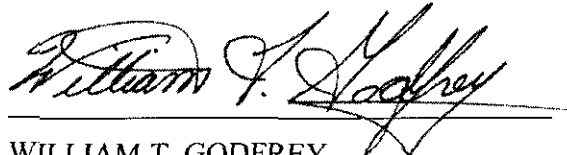
It is herein demonstrated that the proposed Sutter Creek, CA facility would meet the first or second service requirements and that a new NCE-FM station on any reserved channel between 201 and 220 would be considered "technically precluded" based on the fact that no rule-compliant facility could be authorized on any reserved band channel at, or in near proximity to, the allotted Sutter Creek, CA transmitter site. Hence, the need for a NCE-FM service in the proposed service area has been demonstrated and accordingly, pursuant to the Second Report and Order released on April 10, 2003 in the matter of Reexamination of Comparative Standard for Noncommercial Educational Applicants, the Sutter Creek, CA Channel 298 Class A allotment should be reserved for non-commercial use.

Certification

This technical statement was prepared by William T. Godfrey, Telecommunications Consultant with Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida and has been working in the field of radio and television broadcast consulting since 1998. He graduated from the University of North Florida with a Bachelor of Arts degree in Criminal Justice and a minor in Mathematics in 1993. As a Professional in the field of Telecommunications he states under penalty of perjury that the information contained in this report is true and correct to the best of his knowledge and belief.

The logo for Kessler and Gehman Associates, Inc. (KGA) features the letters "KGA" in a stylized, outlined font. The letters are positioned above a thick, horizontal, textured bar that spans the width of the logo.

KESSLER AND GEHMAN ASSOCIATES, INC.

A handwritten signature in black ink, reading "William T. Godfrey". The signature is written in a cursive style and is positioned above a horizontal line.

WILLIAM T. GODFREY
Telecommunications Consultant

19 November, 2003

Sutter Creek, CA Channel 220 Class A

0622E	Sacramento	CA KVIE	38.27167	121.5061	100	550	LI	73.61	236.7692	15
201B	Sacramento	CA KEDR	38.24722	121.5008	8.4	303	LIC	74.76	234.8372	52
202A	Camino	CA CP202	38.73833	120.7028	0.05	155	CP	14.24	37.02703	28
204B1	Sutter	CA KXJS.C	39.20555	121.8194	0.545	603	CP	108.57	306.0401	39
205B	Sacramento	CA KXJZ	38.27361	121.5031	50	150	LIC	73.26	236.7943	52
207A	Lodi	CA 971113	37.97417	120.9689	5.8	45	APP	74.93	191.2646	28
207A	North Highlands	CA KQEIFM	38.71056	121.4817	3.1	108	LIC	59.75	278.1946	28
208B	East Sonora	CA KEKL.C	38.06361	120.2464	1.4	484	CP	79.97	142.5694	52
208B1	Nevada City	CA KVMR	39.24639	120.9633	1.75	345	LIC	69.18	348.4083	39
209A	Rio Vista	CA KRVH.A	38.15472	121.6967	0.2	31	APP	94.7	235.8176	28
209A	Lodi	CA 971113	38.11195	121.2519	0.69	43	APP	70.24	214.0989	28
209C2	Tahoe City	CA 950718	39.31055	119.8836	0.6	893	APP	109.25	46.33319	52
210A	Pollock Pines	CA 970626	38.73833	120.7028	0.1	147	CP	14.24	37.02703	28
211B	Stockton	CA KYCC.A	37.95833	121.2819	50	93	APP	86.17	209.2283	52
211B	Stockton	CA KYCC	37.95278	121.2864	26	55	LIC	86.9	209.2563	52
211B	Stockton	CA KYCC.A	37.95833	121.2819	50	93	APP	86.17	209.2283	52
211B	Stockton	CA KYCC.A	37.95833	121.2819	26	98	APP	86.17	209.2283	52
212B1	Davis	CA KDVS	38.54139	121.7508	9.2	32	LIC	83.36	263.0203	39
213C	Tahoe City	CA KKTO	39.31055	119.8836	38	896	LIC	109.25	46.33319	92
215B	Sacramento	CA KXPR	38.71056	121.4817	50	147	LIC	59.75	278.1946	52
218A	Fairfield	CA KASK.C	38.31917	121.9917	0.075	198	CP	109.64	251.5817	28
218A	Sacramento	CA KYDS	38.60917	121.3606	0.41	33	LIC	48.76	266.643	28
219B	Groveland	CA KXSR	38.06278	120.2458	4	485	LIC	80.07	142.5815	52
221A	Placerville	CA ALLO	38.71861	120.7944	6	100	USE	9.18	3.908876	28
221A	Placerville	CA KZSA.C	38.75861	120.7497	2.95	101	CP	14.33	18.29455	28
221A	Placerville	CA KZSA	38.71861	120.7944	1.85	127	LIC	9.18	3.908876	28
223B	Sacramento	CA ALLO	38.70722	121.4758	50	150	USE	59.2	277.9047	52
223B	Sacramento	CA KGBY	38.70722	121.4758	50	137	LIC	59.2	277.9047	52
224A	Sonora	CA KZSQFM	38.00834	120.3625	0.38	393	LIC	79.57	151.1046	28
224A	Sonora	CA ALLO	37.99389	120.4061	6	100	USE	79.24	154.0848	28
226B	Patterson	CA KOSO	37.72917	121.1969	50	150	LIC	106.46	199.0332	52
228A	Twain Harte	CA KKBN	38.00834	120.3625	0.4	384.7	LIC	79.57	151.1046	28
228A	Twain Harte	CA ALLO	38.06361	120.2464	6	100	USE	79.97	142.5694	28
229B1	Roseville	CA KXOA	38.73944	121.2139	25	100	LIC	37.66	287.9327	39
229B1	Roseville	CA ALLO	38.72	121.2358	25	100	USE	38.91	284.0372	39
230A	South Lake Tahoe	CA ALLO	38.96056	119.9406	6	100	USE	83.03	63.92969	28
230A	South Lake Tahoe	CA KRLT	38.96056	119.9422	3	-32	LIC	82.9	63.88658	28
231A	Grass Valley	CA ALLO	39.24556	120.9644	6	100	USE	69.11	348.315	28
231A	Grass Valley	CA KNCOFM	39.24556	120.9644	0.66	299	LIC	69.11	348.315	28

232B1	Jackson	CA KOSL	38.40278	120.6542	4.3	241	LIC	28.92	153.6378	39
232B1	Jackson	CA ALLO	38.40833	120.6767	25	100	USE	27.53	156.7251	39
234B1	Fair Oaks	CA ALLO	38.67278	121.3297	25	100	USE	46.15	275.2461	39
234B1	Fair Oaks	CA KSSJ	38.67278	121.3311	25	99	LIC	46.27	275.2333	39
236B	Oakdale	CA KHOP	37.79278	120.5189	29.5	193	LIC	96.83	165.1531	52
236B	Oakdale	CA ALLO	37.79278	120.5189	50	150	USE	96.83	165.1531	52
237B1	Vacaville	CA ALLO	38.45833	121.9728	25	100	USE	103.98	259.3808	39
240A	Arnold	CA KBYN	38.37833	120.1933	0.98	246	LIC	60.29	118.2463	28
240A	Arnold	CA KBYN.C	38.37778	120.1925	0.86	263	CP	60.38	118.2647	28
240A	Arnold	CA ALLO	38.30083	120.3356	6	100	USE	55.13	132.429	28
241B	Sacramento	CA KYMX	38.63583	121.5531	50	145	LIC	65.42	270.2074	52
241B	Sacramento	CA ALLO	38.63583	121.5531	50	150	USE	65.42	270.2074	52
243C1	Tahoe City	CA KLCA	39.31055	119.8836	6.1	903	LIC	109.25	46.33319	72
244A	Manteca	CA ALLO	37.72917	121.1969	6	100	USE	106.46	199.0332	28
244A	Manteca	CA KMRQ	37.72889	121.1261	1.5	142	LIC	104.64	195.8018	28
245B	Sacramento	CA KSEG	38.64806	121.4772	50	152	LIC	58.83	271.5076	52
245B	Sacramento	CA ALLO	38.64833	121.4778	50	150	USE	58.88	271.5369	52
249A	Lodi	CA KWIN	38.05139	121.2514	3	91	LIC	75.88	211.239	28
249A	Lodi	CA ALLO	38.05139	121.2514	6	100	USE	75.88	211.239	28
249B1	Oroville	CA KHHZ	39.505	121.3097	1.5	389	LIC	106.01	335.7437	39
249A	Lodi	CA KWIN.C	38.05167	121.2528	6	91	CP	75.92	211.3297	28
250A	Esparto	CA ALLO	38.75278	121.8917	6	100	USE	95.71	278.149	28
250A	Esparto	CA KTTA	38.75917	121.8758	6	100	LIC	94.44	278.686	28
253B	Sacramento	CA KRXQ	38.64806	121.0975	50	151	LIC	25.79	273.0513	52
253B	Sacramento	CA ALLO	38.64305	121.0975	50	150	USE	25.77	271.8133	52
255A	Columbia	CA KCVRFM	38.0375	120.3681	6	100	LIC	76.5	150.2614	28
255A	Columbia	CA ALLO	38.03639	120.4003	6	100	USE	75.25	152.1767	28
256A	Gardnerville-minden	NV KGVM	38.95972	119.8433	3	-249	LIC	90.67	66.27441	28
256A	Gardnerville-minden	NV ALLO	38.94	119.75	6	100	USE	97.4	69.33087	28
257A	Stockton	CA KJOY	37.99166	121.2881	4	98	LIC	83.23	210.7845	28
257B1	Grass Valley	CA KLVS	39.27583	120.8969	13	142	LIC	71.5	353.4236	39
257B1	Grass Valley	CA KLVS.C	39.24583	120.9656	1	330	CP	69.16	348.2431	39
257A	Stockton	CA ALLO	38.0225	121.2675	6	100	USE	79.36	210.9201	28
257A	Stockton	CA KJOY.C	37.99166	121.2881	4.8	110	CP	83.23	210.7845	28
257A	Colfax	CA RADD	38.27583	120.8969	6	100	ADD	40.85	191.7295	28
257B1	Grass Valley	CA RDEL	39.27583	120.8969	25	100	DEL	71.5	353.4236	39
257B1	Grass Valley	CA ALLO	39.28333	120.8917	25	100	USE	72.27	353.8567	39
258B1	Grass Valley	CA KLVS.A	39.24583	120.9656	2.4	330	APP	69.16	348.2431	39
258A	Citrus Heights	CA RADD	38.64361	121.0908	6	100	ADD	25.19	271.992	28
260B	Marysville	CA KRCXFM	39.20555	121.8194	1.75	665	LIC	108.57	306.0401	52
260B	Marysville	CA ALLO	39.20583	121.8197	50	150	USE	108.61	306.046	52
261A	Stockton	CA KQOD	37.9925	121.2139	6	100	LIC	80.02	206.8093	28

261A	Stockton	CA ALLO	38.0225	121.2675	6	100	USE	79.36	210.9201	28
263B	Sacramento	CA ALLO	38.64167	121.0903	50	150	USE	25.14	271.5015	52
263B	Sacramento	CA KZZO	38.64167	121.0903	115	100	LIC	25.14	271.5015	52
265A	Tracy	CA ALLO	37.78111	121.3603	6	100	USE	106.77	207.348	28
266B	Auburn	CA ALLO	38.85778	121.0275	50	150	USE	31.48	321.6009	52
266B	Auburn	CA KHYL	38.85778	121.0275	36	176	LIC	31.48	321.6009	52
268A	Gridley	CA KMJE	39.20583	121.8197	0.14	602	LIC	108.61	306.046	28
268A	Truckee	CA ALLO	39.29583	120.2825	6	100	USE	85.96	31.29811	28
268A	Truckee	CA KTKE	39.24139	120.1389	0.14	606	LIC	88.41	40.21363	28
270B	Shingle Springs	CA KOCLPM	38.85333	120.9397	47	154	LIC	26.94	333.676	52
270B	Shingle Springs	CA ALLO	38.89194	120.9647	50	150	USE	31.74	333.6253	52
272A	Modesto	CA ALLO	37.67972	120.9244	6	100	USE	106.7	185.8022	28
272A	Modesto	CA KJSN	37.68056	120.9239	6	88	LIC	106.6	185.781	28
273B	Woodland	CA ALLO	38.58889	121.725	50	150	USE	80.59	266.5434	52
273B	Woodland	CA KSFM	38.58889	121.725	50	152	LIC	80.59	266.5434	52
275C	South Lake Tahoe	CA ALLO	39.15417	119.8819	100	600	USE	98.36	53.81773	92
275C	South Lake Tahoe	CA KWYL	39.31055	119.8836	39	892	LIC	109.25	46.33319	92
276A	Colusa	CA KKCX	39.20583	121.8197	0.135	599	LIC	108.61	306.046	28
277A	Grass Valley	CA ALLO	39.20861	120.9839	6	100	USE	65.49	346.1489	28
277A	Grass Valley	CA KCEE.C	39.24583	120.9856	0.5	329	CP	69.16	348.2431	28
278A	Sacramento	CA KBMB	38.56639	121.4797	6	95	LIC	59.57	262.7157	28
278A	Sacramento	CA ALLO	38.585	121.49	6	100	USE	60.22	264.7863	28
279C1	Carnelian Bay	CA KODS	39.31055	119.8836	6.3	910	LIC	109.25	46.33319	72
279C1	Carnelian Bay	CA ALLO	39.31278	119.8833	100	299	USE	109.44	46.24727	72
280A	Lincoln	CA RADD	38.9125	121.3889	6	100	ADD	59.54	301.3037	28
280B1	Yuba City	CA ALLO	39.20583	121.8197	25	100	USE	108.61	306.046	39
280B1	Yuba City	CA KXCL.C	39.04528	121.4781	25	100	CP	74.24	308.0462	39
280B1	Yuba City	CA RDEL	39.20555	121.8194	25	100	DEL	108.57	306.0401	39
280A	Lincoln	CA RADD	38.90861	121.3858	6	100	ADD	59.1	301.0756	28
280B1	Yuba City	CA KXCL	39.20555	121.8194	0.51	617	LIC	108.57	306.0401	39
282A	Davis	CA KRRE	38.65722	121.72	3.4	133	LIC	79.98	271.9727	28
282A	Davis	CA ALLO	38.6525	121.7256	6	100	USE	80.45	271.5894	28
283C	Reno	NV ALLO	39.31333	119.8831	100	600	USE	109.5	46.23225	92
283C	Reno	NV KDOT	39.31333	119.8831	25	893	LIC	109.5	46.23225	92
286B	Sacramento	CA KNCI	38.64194	121.0903	50	152	LIC	25.14	271.5722	52
286B	Sacramento	CA ALLO	38.64194	121.0903	50	150	USE	25.14	271.5722	52
288A	Copperopolis	CA KRVR.C	37.94861	120.7044	1	240	CP	76.78	173.6366	28
288A	Copperopolis	CA ALLO	37.98111	120.6408	6	100	USE	74.05	169.0441	28
288B1	Dunnigan	CA ALLO	38.92611	121.9028	25	100	USE	100.95	289.0117	39
288A	Copperopolis	CA KRVR	37.94861	120.7044	1	238	LIC	76.78	173.6366	28
289C	Reno	NV KOZZFM	39.31333	119.8831	25	893	LIC	109.5	46.23225	92
291B1	Arnold	CA KCFA.C	38.37778	120.1925	3.8	257	CP	60.38	118.2647	39

291B1	Arnold	CA KCFA	38.37833	120.1933	3.8	256	LIC	60.29	118.2463	39
291B1	Arnold	CA ALLO	38.37833	120.1933	25	100	USE	60.29	118.2463	39
293B	Sacramento	CA ALLO	38.64167	121.0903	50	150	USE	25.14	271.5015	52
293B	Sacramento	CA KWOD	38.64167	121.0903	50	125	LIC	25.14	271.5015	52
294A	Waterford	CA RADD	37.6725	120.6406	6	100	ADD	107.89	172.4603	28
295C	Incline Village	NV ALLO	39.31055	119.8836	100	600	USE	109.25	46.33319	92
295C	Incline Village	NV KRNO	39.31055	119.8836	37	911	LIC	109.25	46.33319	92
298A	Sutter Creek	CA ALLO	38.39167	120.8017	6	100	VAC	27.13	180	28
299C2	Kings Beach	CA KSRN.A	39.31333	119.8831	0.9	874	APP	109.5	46.23225	52
299C3	Kings Beach	CA ALLO	39.31389	119.8833	25	100	USE	109.52	46.20015	39
299C3	Kings Beach	CA KSRN	39.31333	119.8831	0.23	874	LIC	109.5	46.23225	39
300B	Sacramento	CA ALLO	38.71056	121.4817	50	150	USE	59.75	278.1946	52
300B	Sacramento	CA KDND	38.71056	121.4817	50	123	LIC	59.75	278.1946	52

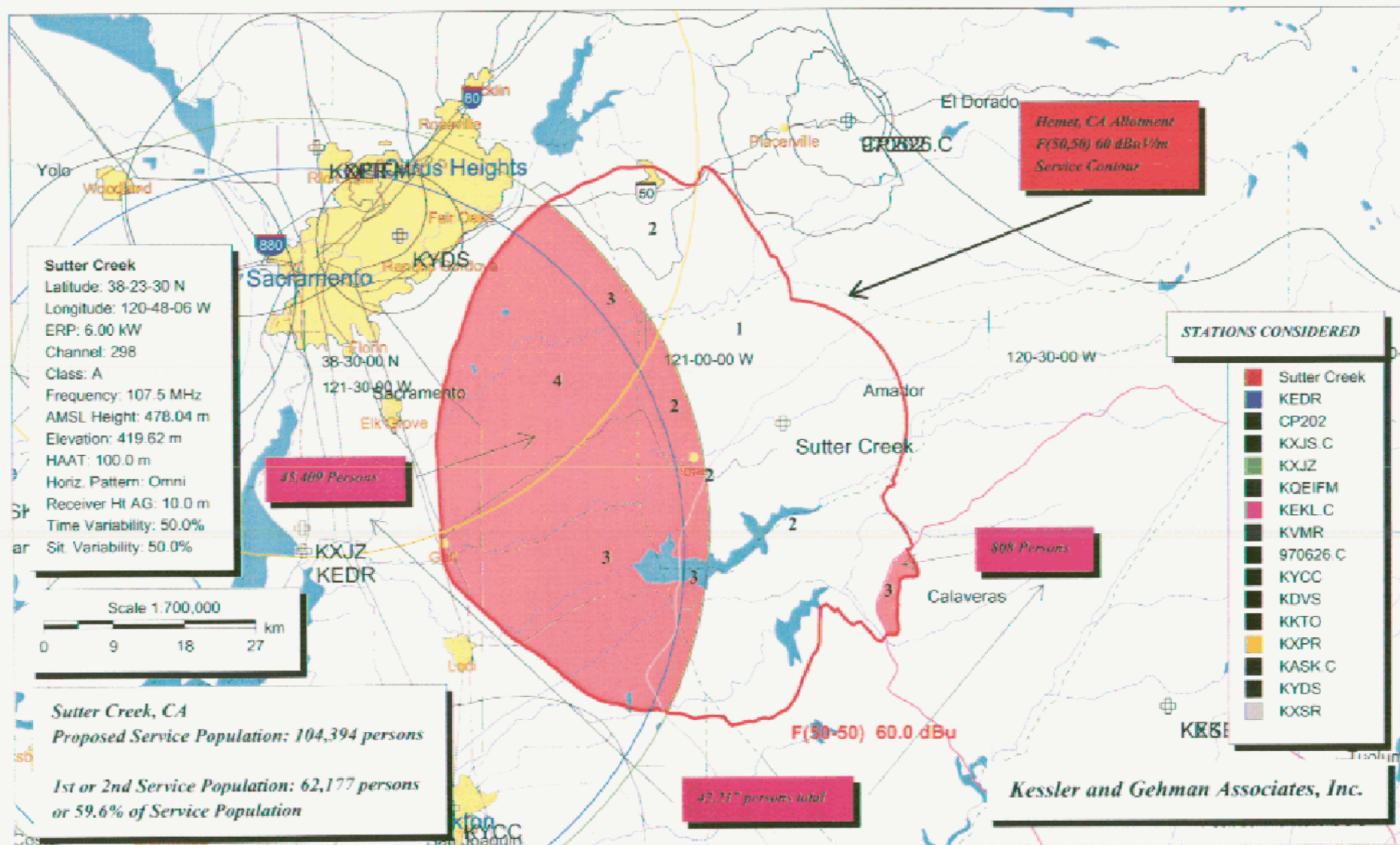


EXHIBIT 2

Kessler and Gehman Associates, Inc.
Consulting Engineers

CHANNEL PRECLUSION STUDY
Sutter Creek, CA Allocation (Center)
Preclusion Study

REFERENCE	Class= A , Pwr= 0.1 kW, HAAT= 0 M, COR= 378 M	DISPLAY DATES
38 23 30 N	Average Protected F(50-50)= 5.64 km	DATA 11-08-03
120 48 06 W	Ave. F(50-10) 40 dBu= 18.6 54 dBu= 8.0 80 dBu= 1.8 100 dBu= .7	SEARCH 11-09-03

CH	CALL	TYPE	AZI.	DIST	LAT.	Pwr(kW)	COR(M)	PRO(km)	*IN*	*OUT*
CITY		STATE	<--	FILE #	LNG.	HAAT(M)	INT(km)	LICENSEE	(Overlap in km)	

--- Channel 201 88.1 MHz. ---

201B	KEDR	LIC V	255.5	63.21	38 14 50	8.4	302	14.4	-68.79	-32.91
Sacramento		CA	75.5	BLED19970602KC	121 30 03	302	47.5	Family Stations, Inc.		

--- Channel 202 88.3 MHz. ---

202A	CP202	CP VX	12.5	39.44	38 44 18	0.05	298	5.6	-15.66	5.90
Camino		CA	192.5	BNPED20000303AAI	120 42 10	298	18.6	Your Christian Companion N		
202B1	KLVN	LIC EX	171.3	87.92	37 36 31	6.1	91	5.6	-3.10	42.17
Livingston		CA	351.3	BLED20020503ABH	120 39 02	91	18.6	Educational Media Foundation		
201B	KEDR	LIC V	255.5	63.21	38 14 50	8.4	302	14.4	-23.05	-7.27
Sacramento		CA	75.5	BLED19970602KC	121 30 03	302	21.9	Family Stations, Inc.		

--- Channel 203 88.5 MHz. ---

203B	KQEDFM	LIC C	241.9	163.33	37 41 23	110	427	14.9	-39.01	31.64
San Francisco		CA	61.9	BLED19971124KD	122 26 13	427	49.0	Kqed, Inc.		
257A	RADD	ADD	212.9	15.32	38 16 33	6	- 318	12.4	12.0R	3.3M
Colfax		CA	32.9		120 53 49	-318	12.4			

--- Channel 204 88.7 MHz. ---

204C	KUNR	LIC CN	44.2	135.49	39 15 34	20	630	5.6	-36.12	40.55
Reno		NV	224.2	BMLD19930412KA	119 42 16	630	18.6	University Of Nevada, Reno		
204B	KMPO	LIC CN	144.2	117.21	37 32 00	2.05	765	5.6	-22.10	41.53

Modesto	CA	324.2	BLED19840213AO	120 01 29	765	18.6	Radio Bilingue, Inc.		
205B KXJZ	LIC DCN	258.1	62.71	38 16 25	50	148	14.2	-29.31	-10.71
Sacramento	CA	78.1	BLED19950926KB	121 30 11	148	21.5	California State Univ., Sa		
257A RADD	ADD	212.9	15.32	38 16 33	6	- 318	12.4	15.0R	0.3M
Colfax	CA	32.9		120 53 49	-318	12.4			
--- Channel 205 88.9 MHz. ---									
205B KXJZ	LIC DCN	258.1	62.71	38 16 25	50	148	14.2	-88.94	-35.98
Sacramento	CA	78.1	BLED19950926KB	121 30 11	148	46.8	California State Univ., Sa		
--- Channel 206 89.1 MHz. ---									
205B KXJZ	LIC DCN	258.1	62.71	38 16 25	50	148	14.2	-29.31	-10.71
Sacramento	CA	78.1	BLED19950926KB	121 30 11	148	21.5	California State Univ., Sa		
--- Channel 207 89.3 MHz. ---									
207A 971113	APP CX	197.5	48.60	37 58 27	5.8	31	10.6	-30.05	-3.15
Lodi	CA	17.5	BPED19971113MD	120 58 08	31	35.9	Educational Media Foundati		
208B KEKL.C	CP DVX	126.8	60.75	38 03 49	0.2605726				
					797	5.6	-2.68	14.43	
East Sonora	CA	306.8	BPED19980619MD	120 14 47	797	8.0	Educational Media Foundati		
--- Channel 208 89.5 MHz. ---									
208B KEKL.C	CP DVX	126.8	60.75	38 03 49	0.2605726				
					797	5.6	-47.58	3.84	
East Sonora	CA	306.8	BPED19980619MD	120 14 47	797	18.6	Educational Media Foundati		
208B1 KVMR	LIC C	351.7	95.92	39 14 47	1.75	493	5.6	-24.41	32.47
Nevada City	CA	171.7	BLED20001020AAK	120 57 48	493	18.6	Nevada City Community Broa		
--- Channel 209 89.7 MHz. ---									
209C 951113	APP DCN	43.2	142.37	39 19 08	6.752654				
					642	5.6	-10.90	58.70	
Reno	NV	223.2	BPED19951113MB	119 40 07	642	18.6	Stockton Chistian Life Col		
Amended 960625									

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CH CITY	CALL	TYPE STATE	AZI. <--	DIST FILE #	LAT. LNG.	Pwr(kW) HAAT(M)	COR(M) INT(km)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
209A Lodi	971113	APP VN CA	231.8 51.8	50.17 BPED19971113MD	38 06 43 121 15 07	0.69 35	35 45.2	13.7 Educational Media Foundati	2.46	-4.87
208B East Sonora	KEKL.C	CP DVX CA	126.8 306.8	60.75 BPED19980619MD	38 03 49 120 14 47	0.2605726 797	797 8.0	5.6 Educational Media Foundati	-2.68	14.43
263B Sacramento	ALLO	USE CA	318.0 138.0	37.47 RM9548	38 38 30 121 05 25	50 -211	- 211 15.9	11.0	10.0R	27.5M
Coordinates updated from LIC record BLH6301										
263B Sacramento	KZZO	LIC DCN CA	318.0 138.0	37.47 BLH19890807KA	38 38 30 121 05 25	35.04053 74	74 15.9	11.0 Infinity Radio Operations	10.0R	27.5M
GRANDFATHERED AT 115 kW ERP and 100 meters HAAT										
--- Channel 210 89.9 MHz. ---										
210B Le Grand	KEFR	LIC CN CA	144.4 324.4	116.89 BLED19910610KB	37 32 01 120 01 50	1.8 771	771 18.6	5.6 Family Stations, Inc.	-20.66	42.27
211B Stockton	KYCC.A	APP DVN CA	221.2 41.2	63.91 BPED19971007IG	37 57 30 121 16 55	50 86	86 19.1	12.8 Your Christian Companion	-15.89	2.56
211B Stockton	KYCC.A	APP DVX CA	221.2 41.2	63.91 BPED19971007IG	37 57 30 121 16 55	50 86	86 19.1	12.8 Your Christian Companion N	-15.89	2.56
263B Sacramento	ALLO	USE CA	318.0 138.0	37.47 RM9548	38 38 30 121 05 25	50 -211	- 211 15.9	11.0	15.0R	22.5M
Coordinates updated from LIC record BLH6301										
263B Sacramento	KZZO	LIC DCN CA	318.0 138.0	37.47 BLH19890807KA	38 38 30 121 05 25	35.04053 74	74 15.9	11.0 Infinity Radio Operations	15.0R	22.5M
GRANDFATHERED AT 115 kW ERP and 100 meters HAAT										
--- Channel 211 90.1 MHz. ---										

211B	KYCC.A	APP DVX	221.2	63.91	37 57 30	50	86	12.8	-77.11	-20.95
Stockton	CA		41.2	BPED19971007IG	121 16 55	86	42.6	Your Christian Companion N		
211B	KYCC.A	APP DCN	221.2	63.91	37 57 30	3.915068				
Stockton	CA		41.2	BPED19971007IG	121 16 55	91	42.6	91	12.8	-27.33 -3.35
								Your Christian Companion N		
211B	KYCC.A	APP DVN	221.2	63.91	37 57 30	50	86	12.8	-77.11	-20.95
Stockton	CA		41.2	BPED19971007IG	121 16 55	86	42.6	Your Christian Companion		
211B	KYCC	LIC DCN	221.1	64.63	37 57 10	4.184287				
Stockton	CA		41.1	BLED19840319AD	121 17 11	48	42.6	48	12.8	-17.24 3.61
								Your Christian Companion N		

--- Channel 212 90.3 MHz. ---

212B1	KDVS	LIC CN	281.7	84.49	38 32 29	9.2	41	13.3	-10.82	20.02
Davis	CA		101.7	BLED19990426KD	121 45 03	41	43.8	Regents Of The Univ. Of Ca		
211B	KYCC.A	APP DVN	221.2	63.91	37 57 30	50	86	12.8	-15.89	2.56
Stockton	CA		41.2	BPED19971007IG	121 16 55	86	19.1	Your Christian Companion		
211B	KYCC.A	APP DVX	221.2	63.91	37 57 30	50	86	12.8	-15.89	2.56
Stockton	CA		41.2	BPED19971007IG	121 16 55	86	19.1	Your Christian Companion N		
213C	KKTO	LIC VN	37.6	129.45	39 18 38	38	912	5.6	-10.72	29.31
Tahoe City	CA		217.6	BLED19970902KB	119 53 01	912	8.0	California State Universit		
Transmitter located in Zone II in Nevada; Vertically Polarized Only										
266B	KHYL	LIC CN	339.3	55.35	38 51 28	36	196	6.1	12.0R	43.4M
Auburn	CA		159.3	BLH19850521KC	121 01 39	196	8.8	Amfm Radio Licenses, L.l.c		

--- Channel 213 90.5 MHz. ---

213C	KKTO	LIC VN	37.6	129.45	39 18 38	38	912	5.6	-70.31	18.72
Tahoe City	CA		217.6	BLED19970902KB	119 53 01	912	18.6	California State Universit		
Transmitter located in Zone II in Nevada; Vertically Polarized Only										
266B	KHYL	LIC CN	339.3	55.35	38 51 28	36	196	6.1	15.0R	40.4M
Auburn	CA		159.3	BLH19850521KC	121 01 39	196	8.8	Amfm Radio Licenses, L.l.c		

--- Channel 214 90.7 MHz. ---

215B	KXPR	LIC CN	301.2	69.04	38 42 38	50	132	12.7	-19.03	0.37
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Sacramento	CA	121.2	BLED19841106KS	121 28 54	132	18.9	California State Universit		
213C KKTO	LIC VN	37.6	129.45	39 18 38	38	912	5.6	-10.72	29.31
Tahoe City	CA	217.6	BLED19970902KB	119 53 01	912	8.0	California State Universit		

Transmitter located in Zone II in Nevada; Vertically Polarized Only

Page # 3

CH	CALL	TYPE	AZI.	DIST	LAT.	Pwr(kW)	COR(M)	PRO(km)	*IN*	*OUT*
CITY	STATE		<--	FILE #	LNG.	HAAT(M)	INT(km)	LICENSEE	(Overlap in km)	

--- Channel 215 90.9 MHz. ---

215B KXPR	LIC CN	301.2	69.04	38 42 38	50	132	12.7	-78.95	-23.03
Sacramento	CA	121.2	BLED19841106KS	121 28 54	132	42.3	California State Universit		

--- Channel 216 91.1 MHz. ---

215B KXPR	LIC CN	301.2	69.04	38 42 38	50	132	12.7	-19.03	0.37
Sacramento	CA	121.2	BLED19841106KS	121 28 54	132	18.9	California State Universit		

217C KNIS	LIC CN	44.1	135.07	39 15 30	67	592	5.6	-0.16	39.64
Carson City	NV	224.1	BLED19891016KA	119 42 36	592	8.0	Western Inspirational Broa		

219B KXSR	LIC DCX	126.8	60.84	38 03 46	4	818	5.6	51.10	-5.22*
Groveland	CA	306.8	BLED20030218AAE	120 14 45	818	0.7	California State Universit		

270B KCCLFM	LIC 2C	346.9	52.64	38 51 12	41.34033				
Shingle Springs	CA	166.9	BLH20010925AAQ	120 56 23	258	258	5.6	15.0R	37.6M
						8.0	Entravision Holdings, Llc		

--- Channel 217 91.3 MHz. ---

217C KNIS	LIC CN	44.1	135.07	39 15 30	67	592	5.6	-58.45	29.05
Carson City	NV	224.1	BLED19891016KA	119 42 36	592	18.6	Western Inspirational Broa		

217B KUOP.A	APP DCX	207.3	110.18	37 30 31	2.4	847	11.6	-40.97	10.00
Stockton	CA	27.3	BPED20020327ABV	121 22 27	847	39.3	University Of The Pacific		

217B KUOP	LIC DCN	205.6	112.10	37 28 48	6.844907				
Stockton	CA	25.6	BLED19830310AI	121 21 02	640	640	11.4	-47.03	8.23
						38.7	University Of The Pacific		

219B KXSR	LIC DCX	126.8	60.84	38 03 46	4	818	5.6	51.10	-5.22*
Groveland	CA	306.8	BLED20030218AAE	120 14 45	818	0.7	California State Universit		

270B	KCCLFM«	LIC ZC	346.9	52.64	38 51 12	41.34033				
						258	5.6	15.0R	37.6M	
Shingle Springs	CA		166.9	BLH20010925AAQ	120 56 23	258	8.0	Entravision Holdings, Llc		
--- Channel 218 91.5 MHz. ---										
219B	KXSR	LIC DCX	126.8	60.84	38 03 46	4	818	5.6	-41.17	-12.51*
Groveland	CA		306.8	BLED20030218AAE	120 14 45	818	8.0	California State Universit		
217C	KNIS	LIC CN	44.1	135.07	39 15 30	67	592	5.6	-0.16	39.64
Carson City	NV		224.1	BLED19891016KA	119 42 36	592	8.0	Western Inspirational Broa		
--- Channel 219 91.7 MHz. ---										
219B	KXSR	LIC DCX	126.8	60.84	38 03 46	4	818	5.6	-91.42	-23.10*
Groveland	CA		306.8	BLED20030218AAE	120 14 45	818	18.6	California State Universit		
273B	KSFM«	LIC CN	285.6	83.48	38 35 20	50	161	12.9	10.0R	73.5M
Woodland	CA		105.6	BMLH19940318KD	121 43 30	161	19.3	Infinity Radio Of Sacramen		
Grandfathered at 50 kW ERP at 152 meters HAAT										
--- Channel 220 91.9 MHz. ---										
219B	KXSR	LIC DCX	126.8	60.84	38 03 46	4	818	5.6	-41.17	-12.51*
Groveland	CA		306.8	BLED20030218AAE	120 14 45	818	8.0	California State Universit		
221A	KZSA«	LIC C	1.0	36.30	38 43 07	1.85	200	5.6	-13.87	-1.21
Placerville	CA		181.0	BLH20000114ABM	120 47 40	200	8.0	First Broadcasting Investm		
221A	KZSA.C«	CP NCX	6.3	40.98	38 45 31	2.95	217	5.6	-16.22	-1.48
Placerville	CA		186.3	BPH20030326AHZ	120 44 59	217	8.0	First Broadcasting Investm		
273B	KSFM«	LIC CN	285.6	83.48	38 35 20	50	161	12.9	15.0R	68.5M
Woodland	CA		105.6	BMLH19940318KD	121 43 30	161	19.3	Infinity Radio Of Sacramen		
Grandfathered at 50 kW ERP at 152 meters HAAT										
06Z2E	KVIE	LI HN	258.0	63.02	38 16 18	100	549	155.9	To Grd B=	-61.47
Sacramento	CA		78.0	BLET20030328ANE	121 30 22	549	216.0	Kvie, Inc.		